

**WESTON & McELVAIN LLP**

RICHARD C. WESTON, Bar #126491

WYNN C. KANESHIRO, Bar #166683

RICHARD C. REY II, Bar # 193212

888 West Sixth Street, 15th Floor

Los Angeles, California 90017

Telephone: (213) 596-8000

Facsimile: (213) 596-8039

Email: [rweston@wmattorneys.com](mailto:rweston@wmattorneys.com)

[wckaneshiro@wmattorneys.com](mailto:wckaneshiro@wmattorneys.com)

[rrey@wmattorneys.com](mailto:rrey@wmattorneys.com)

Attorneys for Defendants THE ST. PAUL  
TRAVELERS COMPANIES, INC. (erroneously  
sued and served as ST. PAUL TRAVELERS)  
and ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

JOYCELYN JONES and JOHN JONES,

Plaintiffs,

vs.

ST. PAUL TRAVELERS, ST. PAUL FIRE  
AND MARINE INSURANCE COMPANY,  
ZURICH INSURANCE COMPANY, ZURICH  
AMERICAN INSURANCE COMPANY,  
AGRICULTURAL INSURANCE COMPANY,  
NATIONAL UNION INSURANCE  
COMPANY and DOES 1 – 20 inclusive,

Defendants.

CASE NO. 3:06-CV-00717-SI

Assigned to: Judge Susan Illston

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING THE DISCOVERY  
CUT-OFF IN ORDER TO CONDUCT  
THE DEPOSITION OF ANDREW  
DESAUTEL**

**WHEREAS**, the Discovery Cut-Off date in the above-referenced action is June 15,

2007;

**WHEREAS**, Defendants ST. PAUL TRAVELERS COMPANIES, INC. and ST PAUL  
FIRE AND MARINE INSURANCE COMPANY (collectively, "Defendants") St. Paul

1 Travelers Companies, Inc. and St. Paul Fire and Marine Insurance Company wish to take the  
2 deposition of Andrew Desautel, who is not a party to the above-referenced action;

3  
4 **WHEREAS**, based on the schedules of Mr. Desautel and counsel for the respective  
5 parties in the above-referenced action, the first available date to conduct Mr. Desautel's  
6 deposition is on June 19, 2007;

7 **WHEREAS**, in order to avoid the costs associated with a motion to extend the  
8 discovery cut-off date, Defendants and Plaintiffs JOYCELYN JONES AND JOHN JONES the  
9 Discovery Cut-Off date should be extended for the sole purpose of conducting Mr. Desautel's  
10 deposition;  
11

12 **THEREFORE**, the parties to this stipulation, through their respective counsel, hereby  
13 stipulate that the Discovery Cut-Off date may be extended until June 19, 2007 or until the date  
14 that Mr. Desautel's deposition is completed.  
15

16 Dated: June 12, 2007

WESTON & MCELVAIN LLP

17  
18 By: 

Richard C. Rey II

Attorneys for Defendants

THE ST. PAUL TRAVELERS  
COMPANIES, INC. (erroneously sued and  
served as ST. PAUL TRAVELERS) and  
ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY

23  
24 Dated: June 12, 2007

GOLDSTEIN, GELLMAN, et al.

25  
26  
27 By: 

Brian Soriano

Attorneys for Plaintiffs JOYCELYN  
JONES and JOHN JONES  
28

**ORDER**

PURSUANT TO THE ABOVE STIPULATION AND GOOD CAUSE APPEARING,  
THEREFORE, IT IS ORDERED that the Discovery Cut-Off date of June 15, 2007 shall be  
extended until June 19, 2007 or until the date Mr. Desautel's deposition is completed.

Dated: June \_\_, 2007

A handwritten signature in blue ink, appearing to read "Susan Blanton".

UNITED STATES DISTRICT COURT JUDGE

**PROOF OF SERVICE**

**Joycelyn Jones v. St. Paul Travelers, et al.**  
**USDC, Northern District Case No. 3:06-CV-00717-SI**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 888 West Sixth Street, 15<sup>th</sup> Floor, Los Angeles, California 90017.

On June 12, 2007, I served the foregoing document described as: **STIPULATION AND [PROPOSED ORDER EXTENDING THE DISCOVERY CUT-OFF IN ORDER TO CONDUCT THE DEPOSITION OF ANDREW DESAUTEL]** on all parties as indicated below:

**"SEE ATTACHED SERVICE LIST"**

☒ by placing the true copies thereof enclosed in sealed envelopes addressed as stated above.

☒ **BY MAIL** as follows: I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business.

☐ **BY FACSIMILE** I sent such document from facsimile machine (213) 596-8039 on June 12, 2007. I certify that said transmission was completed and that all pages were received and that a report was generated by facsimile machine (213) 596-8039 which confirms said transmission and receipt. I, thereafter, mailed a copy to the interested party(ies) in this action by placing a true copy thereof enclosed in sealed envelope(s) addressed to the parties listed on the attached service list.

☒ (Federal) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on **June 12, 2007**, at Los Angeles, California

  
SHARON POLK

SERVICE LIST

Brian E. Soriano, Esq.  
GOLDSTEIN, GELLMAN, MELBOSTAD, GIBSON & HARRIS, LLP  
1388 Sutter Street, Suite 1000  
San Francisco, California 94109-5494  
*Counsel for Plaintiffs Joycelyn Jones and John Jones*

Mary R. McCurdy, Esq.  
MCCURDY & FULLER, LLP  
1080 Marsh Road, Suite 110  
Menlo Park, California 94025  
Telephone: (650) 618-3500  
Facsimile: (650) 618-3599

*Counsel for Defendants Zurich American Insurance Company, a corporation (erroneously sued and served as Zurich Insurance Company and Zurich American Insurance Company); Great American Assurance Company (improperly sued herein as Agricultural Insurance Company); and National Union Fire Ins. Co. of Pittsburgh, PA (erroneously sued and served as National Union Insurance Company)*